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CIVIL & TRAFFIC ENGINEERS / LAND SURVEYORS / PLANNERS / LANDSCAPE ARCHITECTS
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Narrative Statement
Application for Regulated Wetlands Activity
Fintech Village, LLC
Undergraduate Building
Demolition, Erosion & Sedimentation Control & Soil Remediation
1800 Asylum Avenue
West Hartford, Connecticut
DPI Project No. 2815.B
November 27, 2019 - Revised

Bestech, Inc. (Applicant) of Connecticut has been retained by Ideanomics, LLC (Property Owner) of New York to perform environmental and demolition services at the proposed mixed-use campus known as “Fintech Village”, at UConn’s former West Hartford campus adjacent to Trout Brook Drive and Asylum Avenue. For the second wetlands application for this project, the applicant is requesting approval to demolish down to the first-floor slab the former Undergraduate building at 1800 Asylum Avenue, a three-story steel and masonry structure on the north end of the campus. The building is contaminated with asbestos and PCBs. Bestech, a Connecticut-licensed environmental abatement and demolition contractor, is also requesting approval to remove PCB-contaminated soil around the periphery of the building. The firm has recently completed an asbestos abatement phase for the interior of the structure. Future wetland applications will address abatement, remediation and demolition services associated with the last PCB & asbestos-contaminated building on the campus, the library, as well as PCB contaminated soil. These are all necessary elements to facilitate development of Ideanomics’ Fintech Village campus.

Bestech is abating and removing contaminated buildings and soil pursuant to environmental reports and investigations performed by Eagle Environmental, Inc., and in accordance with plans and procedures in close consultation with the Connecticut Department of Energy & Environmental Protection and the United States Environmental Protection Agency. A representative of Eagle Environmental expressed email confirmation that neither the DEEP (August 20th) or EPA (August 22nd) had any further comments about the contractor work plan provided in this application; documentation of that approval was provided to Design Professionals, Inc. by James Newbury, President, Bestech, Inc. on October 7, 2019 (see Appendix item number 8).

The subject tract, owned by Fintech Village, LLC., has 33.9 acres, and wetlands were previously determined by Milone & MacBroom, under contract with the Town of West Hartford. A Fintech Village wetlands consultant, All Points, concurs with that determination as told to Design Professionals, Inc. with no documentation provided. Ideanomics, through Bestech, has also retained Design Professionals, Inc. (DPI) to perform civil engineering design services associated

with this application, as well as JMM Wetland Consulting Services, LLC (JMM), to perform wetland and erosion control advisory services.

As depicted on DPI's engineered site plan, Bestech will be completing work in an area encompassing 45,956 square feet, of which 9,863 square feet is within the 150 feet upland review area. The building occupies 17,368 square feet within that area but is not counted as disturbance. Since the building is being removed down to the first-floor slab, the ground condition within that area is not being disturbed. With that, the total 45,956 square feet is disturbance directly associated with the removal of the contaminated soil and construction activity around the contaminated zones. The volume of soil to be removed from the site is $346\pm$ cubic yards at depths ranging from 1 foot to 2 feet. Of that total, $46.52\pm$ cubic yards are being removed from the regulated upland review area also at depths ranging from 1 foot to 2 feet. The area to be removed at each respective soil depth is outlined on the Eagle Environmental PCB Soil & Hardscape Remediation plan on page PCB-1, included below.

There are no actual wetland disturbances proposed with this application. The wetlands to the west of the activity area is a mowed wet meadow, which is relatively flat. The wetlands well easterly of the activity area is a pond. In order to ensure ongoing performance of the erosion control measures, JMM has recommended 105 lineal feet of heavy duty "Super Silt Fence" proximate to the westerly wetland boundary, as well as an adjacent 12" entrenched excelsior wattle system filled with wood fiber, to be installed on the building side of the silt fence. To supplement the measures recommended by JMM, the West Hartford Engineering Division recommended the addition of typical silt fence "along all downstream slopes around the building at the limits of construction." A total of 764 linear feet of silt fence has been added to page C-ES1 with construction details on page C-ES2. These measures will act to prevent the migration of fine textured soils to the site's wetlands. Additional measures taken by Bestech's activities are defined in their Demolition, Erosion Control and Soil Remediation Work Plan to diligently monitor these measures, appended herewith along with JMM's report.

The only alternative to the demolition of this building and removal of adjacent contaminated soils would be to leave the contaminated elements on site in their current condition. Due to the health and safety concerns of that alternative for both human and non-human ecosystems, it is not a feasible option to explore. Indeed, the Connecticut DEEP has a Notice of Violation (NOV) on the site that stems from the PCB's washing off the window caulking over the years and into the soil (see 11-18-19 Fintech Village, Executive Summary by Bestech). Given that the design and execution of this removal and erosion control plan have no direct disturbance of the wetlands on site, the proposal included in this application is the option that provides the highest level of environmental responsibility, protection, and remediation of all surrounding wetlands, watercourses, and upland review areas.

Given the similar nature of this application to that of the approved work for the School of Social Work building also on site, an engineered site plan (dated 11-11-19) is provided to address erosion and sedimentation control measures. We offer the following summary of interventions to ensure the protection of the surrounding wetlands and site drainage: 1) Bestech will be exposing selected catch basins under the plastic sheeting/plywood around the building in order to facilitate drainage flow. Each catch basin will be protected with silt sacks and haybales, which is depicted on the site plan. Jim McManus of JMM previously concurred with these measures; 2) Building roof leaders will be plugged prior to demolition and soil remediation; 3) The temporary diversion swale detail

on sheet C-ES2 is only depicted in the event it is necessary; 4) The existing chain link construction fence around the work area will remain in place until a site plan has been approved and construction begins for the Fintech Village campus; 5) Prior to dewatering activities, the water will be tested by Eagle Environmental for contaminants. If test results determine the water is clear of contaminants, it will be released to the ground through a silt sack. If test results do not approve the release of water to the ground, the following will occur: "Liquid Wastes generated as a result of the PCB remediation and equipment decontamination shall be profiled by the Contractor and if characterized as TSCA-regulated waste, they shall be burned in a high temperature incinerator or managed (treated) in accordance with §761.60 and §761.79." (page 23, item 6 of the Eagle Environmental, Inc. "Self-implementing PCB Cleanup and Disposal Plan"); 6) Contaminated material will be temporarily stockpiled on site in the locations provided in Bestech's attached Work Plan. As outlined in that work plan, excavated material will be loaded into haul trucks and transported to the designated stockpile area. A sketch is provided showing the construction of the stockpiles for safe temporary storage until the material is removed from the site. Once the material is properly sampled, it will be loaded into alternative transport vehicles and moved to the appropriate disposal facilities out of state.; 7) Vegetation in the contaminated area will be removed as if it were contaminated, with the exception of tree trunks and branches; 8) All equipment decontamination will be undertaken at the completion of the soil remediation in locations specified on Bestech's attached Work Plan; 9) The DPI site plan indicates holes left as a result of soil removal will be shaped to OSHA standards (maximum 2:1 slopes, maximum depth 6 feet), and the building slab will remain as is. This is expected to be a temporary condition. The entire work area will remain inside a perimeter fence enclosure until available for implementation of the Fintech Village site development on the existing foundation in this area.

Eagle Environmental will have staff on site during the duration of Bestech's abatement, remediation and demolition activities. Part of their assignment will be to monitor the condition and performance of the erosion and sedimentation control measures, weekly and immediately following storm events.

In conclusion, the permitted activities will serve to clean up the contaminated former UConn campus in preparation for development of Ideanomics' mixed-use Fintech Village. These activities will prevent impacts on the adjoining wetlands. All abutting property owners to this project have been listed on the appended site plan set and will be contacted by the Town regarding this application and activity. This document references the scope of work provided in Section 7.5 of the Town of West Hartford Inland Wetlands and Watercourses Regulations for an application for regulated wetlands activity. A Permit Application for Inland Wetlands & Watercourses Activity and CTDEEP Statewide Inland Wetlands & Watercourses Activity Reporting Form have been completed and filed along with the appropriate filing fee. The appendix lists all of the additional documents to be used in review of this application.

Appendix

- 1) Undergraduate Building Demolition Site Plan set, dated 11/11/19; prepared by Design Professionals, Inc.
- 2) Topographic Survey, dated 5/30/19; prepared by Langan CT, Inc.
- 3) Wetland Delineation, dated 7/10; prepared by Milone and MacBroom
- 4) Fintech Village, Asbestos Abatement, Demolition, PCB Soil Remediation, Executive Summary to Todd Dumais, dated 11/18/19; prepared by James Newbury, President, Bestech, Inc.
- 5) Work Plan for the Soil/Hardscape Remediation of the Social Work, Library, and Undergraduate Buildings (applicable sections), dated 11/18/19; prepared by Bestech, Inc.
- 6) Site Visit, E&S Recommendations, dated 11/22/19; prepared by JMM Wetland Consulting Services, LLC
- 7) Eagle Environmental, Inc. Supplemental Documents
 - a. Self-Implementing PCB Cleanup and Disposal Plan, dated 5/1/19**
 - b. PCB-1: Undergraduate Building PCB Soil & Hardscape Remediation Plan, dated 5/1/19
 - c. P-1: Undergraduate Building Soil Photos, dated 5/1/19
- 8) CT DEEP & EPA email “approval” of Fintech Village work plans, dated 8/20/19 and 8/22/19; provided by Eagle Environmental, Inc.
- 9) Asylum Avenue, West Hartford, CT Soil Map and Report, analysis run on 9/27/19; prepared by Design Professionals, Inc. via USDA Web Soil Survey